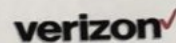


EXHIBIT A



Verizon Security Subpoena Compliance
180 Washington Valley Road
Bedminster, NJ 07921
PHONE: 800-451-5242 | FAX: 888-667-0028

June 10, 2020

Ryan Grim
[REDACTED]

Verizon Case # 20133266
Docket #: 19 Civ 11861
TELEPHONE #: [REDACTED]

Dear Customer,

This is to notify you that Verizon has received a deposition subpoena requiring the production of certain records associated with the target referenced above.

Verizon has no information as to the purpose of the deposition subpoena or the nature of the action or investigation being undertaken. Any questions you have should be directed to the party who issued the deposition subpoena.

Please be advised that unless Verizon is provided with a motion for a protective order or a motion to quash within 10 days from the date of this letter, or by the date specified in the deposition subpoena (whichever is later), Verizon intends to produce the records. Motion papers can be sent to Verizon via fax number 325-949-6916

Sincerely,

Debbie H
Coordinator-Verizon Security Subpoena Compliance
800-451-5242

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for the
Southern District of New York

Elliott Broidy and Broidy Capital Management, LLC

Plaintiff

v.

Global Risk Advisors LLC, et al.

Defendant

Civil Action No. 19 Civ. 11861

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: Verizon Wireless Services, LLC

(Name of person to whom this subpoena is directed)

☒ **Production:** YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Schedule A attached.

Place: Steptoe & Johnson LLP c/o Charles Michael
1114 Avenue of the Americas
New York, NY 10036

Date and Time:

06/22/2020 9:00 am

☐ **Inspection of Premises:** YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 06/01/2020

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Plaintiffs

Elliott Broidy and Broidy Capital Management, LLC, who issues or requests this subpoena, are:

Charles Michael, Steptoe & Johnson LLP, 1114 Ave. of Americas, NY, NY 10036, cmichael@steptoe.com, (212) 378-7604

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

DOCUMENTS REQUESTED

1. All Documents produced by Verizon Wireless Services, LLC in response to the subpoenas served on You on May 1, 2018, May 16, 2018, June 6, 2018, June 26, 2017, July 6, 2018, July 20, 201, and July 27, 2018, in the case *Broidy Capital Management LLC v. State of Qatar*, No. 18-cv-02421-JFW (C.D. Cal., filed Mar. 26, 2018).
2. Documents sufficient to identify the names and addresses of the subscriber(s) for the Subject Phone Numbers from January 1, 2017, to the present, as well as all other phone numbers assigned to each of those subscribers.
3. Documents sufficient to identify the IP address(es) assigned to each Subject Phone Number, geographic tracking information, and cell tower usage, as well as IP addresses used to send or receive calls or messages using VOIP services or "WiFi Calling" (including SMS and MMS messaging) of the subscriber(s) for the Subject Phone Numbers or any other numbers for the subscriber(s) of the Subject Phone Numbers from January 1, 2017, to the present.
4. Call logs or documents reflecting the telephone numbers called and received (including the duration of the calls) concerning the use of the Subject Phone Numbers or any other numbers for the subscriber(s) of the Subject Phone Numbers from January 1, 2017, to the present.
5. Text message or SMS logs or MMS logs or documents reflecting records of transmission of text or SMS messages or MMS messages sent and received concerning the use of the Subject Phone Numbers or any other numbers for the subscriber(s) of the Subject Phone Numbers from January 1, 2017, to the present.
6. Documents reflecting the length and history of service with You for the subscriber(s) for the Subject Phone Numbers or any other numbers for the subscriber(s) of the Subject Phone Numbers.

7. Documents reflecting user and activity logs of the subscriber(s) for the Subject Phone Numbers or any other numbers for the subscriber(s) of the Subject Phone Numbers from January 1, 2017, to present.

8. Billing statements of the subscriber or subscribers for the Subject Phone Numbers or any other numbers for the subscriber(s) of the Subject Phone Numbers from January 1, 2017, to the present.

9. Registration information associated with each Subject Phone Number, including the name(s) and address(es) associated with payments made on the account, as well as IP addresses and dates and times of all logins to the customer's online account.